



Maine Organic Farmers and Gardeners Association

*Common Ground Country Fair • The MOF&G Newspaper
Crop Certification • Education and Technical Services*

May 15, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket #98N-1038, "Irradiation in the production, processing, and handling of food"

Dear Sirs:

The Maine Organic Farmers and Gardeners Association, with 3,000 members, would like to go on record in support of continued labeling of foods that have been treated with ionizing radiation (irradiated).

Maine has a long history on this subject. For a number of years, beginning about 1987, the State prohibited the sale of irradiated food, partly in response to indications from FDA that the radura symbol would be withdrawn after a short period of time. As food safety concerns increased, and there were assurances from FDA that labeling would continue, that prohibition was removed about 1997.

We have two principal reasons for supporting continued labeling. The first is the one which you will hear most often, the right for consumers to make choices about the kinds of foods they buy and the ways that they are produced and/or processed. We strongly support this position in all aspects of food production and processing, including information about the ingredients of foods and their origins.

The second is particular to the organic farm sector. Without labeling, there are possibilities that foods that have been irradiated may be sourced as ingredients in processed organic foods. This would be in violation of the standards of MOFGA and, we believe, all the other private certifying organizations in this country and beyond. To avoid this possibility, we would have to require all of our farmers and processors who buy ingredients to have letters indicating that there is no irradiation used in the production of each individual ingredient. This will be a financial burden to our farmers that could readily be avoided by continuing the current labeling standards.

We estimate that 30 of our 180 certified farmers do value-added processing that might be affected by your decision, and that each of them would have to write letters to verify

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information from three to five suppliers each year. Extended across the country, it would leave a rapidly-growing sector of U.S. agriculture in search of information that apparently would not be provided. Organic agriculture in the U.S. now constitutes about \$4.5 billion in sales each year, with close to half coming from value-added products that may, directly or indirectly, be affected by this rule.

We urge you to continue the current labeling requirements. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Russell Libby".

Russell Libby
Executive Director



**Maine Organic Farmers
and Gardeners Association**
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